



The Cousteau Society

May 8, 2001

Donna Wieting, Chief
Marine Mammal Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3226

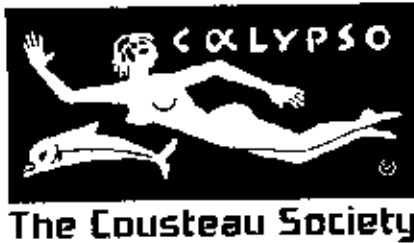
Dear Dr. Wieting:

The Cousteau Society strenuously opposes application by the US Navy to take marine mammals by harassment incidental to operation of the Surveillance Towed Array Sensor System Low Frequency Active (SURTASS LFA) Sonar. In view of the extraordinary cetacean strandings linked to Sonar exercises and the tenuous strands of information available from the Navy about the effects of active sonar, we urge the National Marine Fisheries Service to adopt a firm precautionary approach and refuse to authorize deployment of SURTASS LFA at this time.

Rather than tediously reviewing the substantive testimony of scientists *in toto*, The Cousteau Society simply and strongly endorses the findings of Dr. Kenneth Balcomb as expressed in his letter of February 23, 2001, to Mr. J.S. Johnson, OEIS/EIS Program Manager. Dr. Balcomb's conclusions from his examination of stranded animals in the Bahamas far outweighs the lack of evidence from the Navy's preliminary tests of the Sonar's effects, the Low Frequency Sound Scientific Research Program (LFS SRP). Although we have great respect for the scientists engaged by the Navy for the LFS SRP, we find the tests to have been too limited by design, time and scope to justify the conclusion of "no harm." They constitute a scant beginning for a truly reliable effort to ascertain the effects of adding this proposed acoustic pollution to an already noisy ocean. Such an analysis absolutely must be completed before the SURTASS LFA Sonar is deployed.

Allowing the Navy to move forward now with the development of an LFA fleet on the basis of its assurances that it will not harm wildlife, in the face of empirical evidence to the contrary, may put NMFS in an untenable position; if, in the future, it turns out that the Sonar is destructive, NMFS will find it extremely difficult to halt such an expensive, vested operation. Far wiser, in financial and environmental terms, to stop the program immediately until and unless it is scientifically proven that sea life will not be irreparably damaged.

/.....



May 8, 2001
Page two

The need for a precautionary halt to deploying the LFA is clearly indicated by the recent press release from NOAA Fisheries confirming "hemorrhages around the brain and ear bones" of the beaked whales stranded in the Bahamas and the finding that "sonars were linked to this stranding." It has taken a team of approximately fifty scientists, with all the support that NMFS and the Navy have to offer, to come this far investigating that one stranding instance, and further studies are expected to take another year. By comparison, it is patently disingenuous for the Navy to conclude that three brief iterations of limited testing prove it can use LFA without affecting wildlife.

Marine life, cetaceans in particular, rely on acoustic cues for any number of biological and behavioral data that are vital to their survival. Humans are cluttering the auditory environment under the sea at an ever-increasing pace. Rather than simply allow the Navy to seek out exculpatory indications that its operations are harmless, NMFS must persist in your mandate to protect marine species; you must demand proof positive that this powerful new sound source can be mitigated sufficiently to ensure the safety of all ocean creatures.

Sincerely,

Robert L. Steele
Vice President